

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GRASSI, <i>et al.</i> ,)	Case No. 1:18-CV-2619-PAB
)	
)	Judge Pamela A. Barker
Plaintiffs,)	
)	
v.)	
)	
JOHN GRASSI, <i>et al.</i> ,)	
)	
Defendants.)	

PROPOSED JOINT STIPULATIONS OF FACT

Pursuant to the Court's Civil Trial Order dated June 3, 2022 (ECF Doc. 137), plaintiffs Michael Grassi and CFOM, Inc., and defendants John Grassi and Alotech Limited LLC, submit this proposed joint stipulations of fact to the Court.

* * *

Proposed Joint Stipulations of Fact

1. John Grassi and Michael Grassi are twin brothers.
2. John Grassi is the sole owner and President of Alotech Limited, LLC.
3. Michael Grassi is the sole owner of CFOM, Inc
4. Charles Rizzuti is not, and has never been, an employee of Alotech.

November 28, 2022

Respectfully submitted,

/s/ Jeffrey Saks

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